

Fund for the months of January 2016 through June 2016 in Local 91 remaining unpaid pursuant to remittance reports submitted by Defendant (Exhibit A); and it is

FURTHER ORDERED, that Plaintiffs are awarded, and Defendant shall pay to the National Pension Fund, \$4,624.24 in interest, assessed at the rate of 12% per annum from date due through date of payment or October 31, 2016 and continuing to accrue at the rate of 12% per annum through the date of payment (Exhibit A);

FURTHER ORDERED, that Plaintiffs are awarded, and Defendant shall pay to the National Pension Fund, \$7,878.88 in liquidated damages for the months of January 2016 through June 2016 (Exhibit A);

FURTHER ORDERED, that Plaintiffs are awarded, and Defendant shall pay to Plaintiffs, \$1,000.00 in reasonable attorneys' fees and \$626.29 in costs incurred in filing this action;

FURTHER ORDERED, that Defendant shall pay to Plaintiffs any additional attorneys fees and costs incurred by Plaintiffs in enforcing Defendant's contribution obligations or to enforce or execute on this Consent Judgment; and it is

FURTHER ORDERED, that Defendant, its officers, agents, servants, employees, representatives, and any persons acting on its behalf are hereby enjoined and ordered to (1) file any remittance reports and make payments due to the Plaintiffs, on or before the date of said payments are due; and (b) make all payments due to the Plaintiffs under the terms of this Consent Judgment and Injunctive Order; and any collective bargaining agreement or as otherwise required by law; and it is

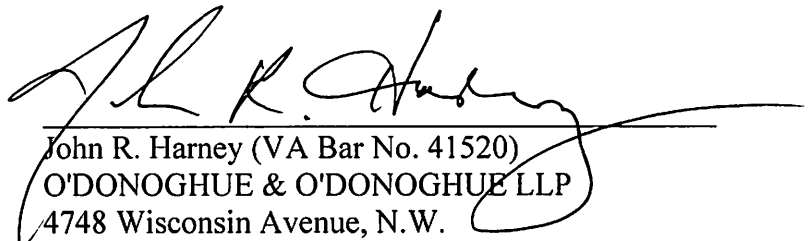
FURTHER ORDERED, that this Consent Judgment and Injunctive Order is subject to execution in any court of competent jurisdiction, and any and all terms of this Consent Judgment and Injunctive Order may be enforced by Plaintiffs in any court of competent jurisdiction.

We ask for this:

Trustees of the Plumbers and Pipefitters National Pension Fund and Trustees of the International Training Fund,

Dated: 11/3/2016

By:

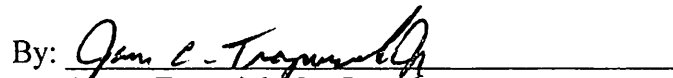

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Counsel for Plaintiffs

SHOOK & FLETCHER MECHANICAL
CONTRACTORS, INC.
2915 Richard Arrington Jr. No.
Birmingham, AL 35203
Telephone No.: (205) 252-9400
Facsimile No.: (205) 252-9407
Email: jimbo@shook-fletcher.com

Dated: 10-27-16

By:


James Traywich, Jr., President

Authorized on behalf of Defendant Shook & Fletcher Mechanical Contractors, Inc.


LITTLER MENDELSON, P.C.
1650 Tysons Boulevard, Suite 700
McLean, VA 22102
Telephone No.: (703) 442-8425
Facsimile No.: (703) 442-8428
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Dated: 11/3/2016

By: 
Joon Hwang (VA Bar No. 82248)

Counsel for Shook & Fletcher Mechanical
Contractors, Inc.

SO ORDERED this 7th day of Nov., 2016.

 /s/
James C. Cacheris
United States District Judge
United States District Judge
Alexandria, Virginia

SHOOK & FLETCHER MECHANICAL CONTRACTORS, INC.
Civil Action No: 1:16-964 JCC-MSN

NATIONAL PENSION FUND and INTERNATIONAL TRAINING FUND
Interest Assessed at the Rate of 12% Per Annum
CONTRIBUTIONS, LIQUIDATED DAMAGES AND INTEREST:

<u>FUND</u>	<u>CONTRIB.</u>	<u>LIQUIDATED DAMAGES</u>	<u>INTEREST</u>	<u>TOTAL</u>
Pension	\$73,864.50	\$7,386.45	\$4,475.07	\$85,726.02
Training	\$2,462.15	\$492.43	\$149.17	\$3,103.75
Totals:	\$76,326.65	\$7,878.88	\$4,624.24	\$88,829.77
Costs:				\$626.29
Attorneys Fees:				<u>\$1,000.00</u>
Total:				\$90,456.06

EXHIBIT

tabbles

A

SHOOK & FLETCHER MECHANICAL CONTRACTORS, INC.
Civil Action No: 1:16-964 JCC-MSN

NATIONAL PENSION FUND

Interest Assessed at the Rate of 12% Per Annum

CONTRIBUTIONS, LIQUIDATED DAMAGES AND INTEREST:

<u>DATE</u>	<u>SHORTAGES/ REPORTS/ NO MONEY</u>	<u>TOTAL CONTRIB. OWED</u>	<u>LIQUIDATED DAMAGES</u>	<u>DAILY INTEREST RATE</u>	<u>DAILY INTEREST</u>	<u>DUE DATE</u>	<u>DATE PAID/ CURRENT DATE</u>	<u>DAYS LATE</u>	<u>TOTAL INTEREST</u>
Jan-16	\$13,639.50	\$13,639.50	\$1,363.95	0.033%	\$4.50	20-Feb-16	31-Oct-16	254	\$1,143.26
Feb-16	\$13,083.00	\$13,083.00	\$1,308.30	0.033%	\$4.32	20-Mar-16	31-Oct-16	225	\$971.41
Mar-16	\$12,309.00	\$12,309.00	\$1,230.90	0.033%	\$4.06	20-Apr-16	31-Oct-16	194	\$788.02
Apr-16	\$13,986.00	\$13,986.00	\$1,398.60	0.033%	\$4.62	20-May-16	31-Oct-16	164	\$756.92
May-16	\$10,794.00	\$10,794.00	\$1,079.40	0.033%	\$3.56	20-Jun-16	31-Oct-16	133	\$473.75
Jun-16	\$10,053.00	\$10,053.00	\$1,005.30	0.033%	\$3.32	20-Jul-16	31-Oct-16	103	\$341.70
TOTALS	\$73,864.50	\$73,864.50	\$7,386.45						\$4,475.07

Contributions:	\$73,864.50
Liquidated Damages:	\$7,386.45
Interest:	<u>\$4,475.07</u>
Total:	\$85,726.02

SHOOK & FLETCHER MECHANICAL CONTRACTORS, INC.
Civil Action No: 1:16-964 JCC-MSN

INTERNATIONAL TRAINING FUND

Interest Assessed at the Rate of 12% Per Annum

CONTRIBUTIONS, LIQUIDATED DAMAGES AND INTEREST:

<u>DATE</u>	<u>REPORTS/ NO MONEY</u>	<u>TOTAL CONTRIB. OWED</u>	<u>LIQUIDATED DAMAGES</u>	<u>DAILY INTEREST RATE</u>	<u>DAILY INTEREST</u>	<u>DUE DATE</u>	<u>DATE PAID/ CURRENT DATE</u>	<u>DAYS LATE</u>	<u>TOTAL INTEREST</u>
Jan-16	\$454.65	\$454.65	\$90.93	0.033%	\$0.150	20-Feb-16	31-Oct-16	254	\$38.11
Feb-16	\$436.10	\$436.10	\$87.22	0.033%	\$0.144	20-Mar-16	31-Oct-16	225	\$32.38
Mar-16	\$410.30	\$410.30	\$82.06	0.033%	\$0.135	20-Apr-16	31-Oct-16	194	\$26.27
Apr-16	\$466.20	\$466.20	\$93.24	0.033%	\$0.154	20-May-16	31-Oct-16	164	\$25.23
May-16	\$359.80	\$359.80	\$71.96	0.033%	\$0.119	20-Jun-16	31-Oct-16	133	\$15.79
Jun-16	\$335.10	\$335.10	\$67.02	0.033%	\$0.111	20-Jul-16	31-Oct-16	103	\$11.39
TOTALS	\$2,462.15	\$2,462.15	\$492.43						\$149.17

Contributions:	\$2,462.15
Liquidated Damages:	\$492.43
Interest:	<u>\$149.17</u>
Total:	\$3,103.75